

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	
	)	
vs.	)	NO. 4:20 CR 00712 SRC
	)	
COURTNEY CURTIS,	)	
	)	
Defendant.	)	

**GOVERNMENT'S RESPONSE TO DEFENDANT'S OBJECTIONS TO THE  
PRESENTENCE INVESTIGATION REPORT**

Comes now the United States of America, by and through Sayler A. Fleming, United States Attorney for the Eastern District of Missouri, and Hal Goldsmith, Assistant United States Attorney for said District and, for its Response to Defendant's Objections to Presentence Investigation Report (Doc. 49), states to this Honorable Court as follows:

1. Defendant objects to Paragraph 102 of the Presentence Investigation Report ("PSR"). Specifically, defendant objects to the recommended Special Condition of any period of supervised release that he "...must not enter any casino or other establishment where gambling is the primary purpose." It is the position of the United States that there is sufficient undisputed information contained within paragraphs 20 and 55 of the PSR to support such a recommended Special Condition. As an alternative, this Court could simply include the condition that U.S. Probation evaluate defendant's gambling habits and history at the time he begins serving his period of supervised release, and place any and all appropriate restriction upon defendant at that time relative to defendant's access to gambling establishments.

2. Defendant also objects to Paragraph 54 of the PSR. Defendant does not, however,

suggest that Paragraph 54 misstates anything which Defendant reported to the Office of U.S. Probation. Defendant's objection appears to be an attempt to supplement the information he previously provided and which is included at Paragraph 54. The United States has no basis to know whether the information contained within Defendant's objection is true and accurate, and, therefore, defers to the Court on this matter.

WHEREFORE, the United States defers to this Court as to its determination and ruling on Defendant's instant Objections to the PSR, and for such other relief as this Court determines to be just and proper under the circumstances.

Respectfully submitted,

SAYLER A. FLEMING  
United States Attorney

/s/ Hal Goldsmith  
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**CERTIFICATE OF SERVICE**

I hereby certify that on March 17, 2021, the foregoing was filed electronically with the Clerk of the Court to be served by operation of the Court's electronic filing system upon the counsel for defendant.

/s/ Hal Goldsmith  
HAL GOLDSMITH  
Assistant United States Attorney